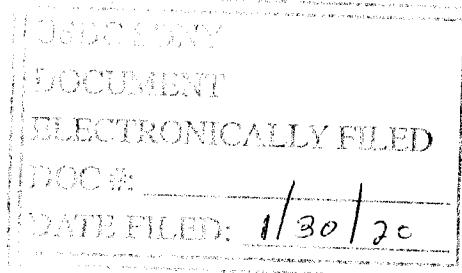


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January 29, 2020

FILED & SERVED ELECTRONICALLY (via ECF as a Letter)**NOTICE ENDORSED**

Hon. Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

SEARCHED: INDEXED: DATE: 1/29/20
Schenk, 1/30/20
BY: GORENSTEIN
U.S. MAGISTRATE JUDGE

Re: *Bridgeton Landfill, LLC v. Mallinckrodt LLC and Everzinc USA, Inc.*
Miscellaneous Action No. 1:19-mc-00540

Dear Magistrate Judge Gorenstein:

We represent respondent Citigroup Inc. ("Citigroup") in the above-captioned miscellaneous action, wherein petitioner Bridgeton Landfill, LLC ("Petitioner") has filed a motion to compel production of documents from respondent Citigroup pursuant to Fed. R. Civ. P. 45(d)(2)(B)(i) ("Motion to Compel"), relating to a subpoena issued out of the United States District Court for the Eastern District of Missouri in *Bridgeton Landfill, LLC v. Mallinckrodt LLC and EverZinc USA Inc.*, Civil Action No. 4:18-cv-01800-RWS. We write pursuant to Rule 1.E of Your Honor's Individual Practices, with the consent of Petitioner's counsel, to request a short further extension of the briefing schedule on Petitioner's Motion to Compel such that (a) Citigroup's response to Petitioner's Motion to Compel will be due on or before January 31, 2020 and (b) Petitioner's reply, if any, may be filed on or before February 19, 2020.

In support of this request, Citigroup states:

1. Citigroup agreed to waive formal service of Petitioner's Motion to Compel and accept electronic service through counsel on November 26, 2019, provided that Petitioner agreed to grant Citigroup an extension of time to respond to the Motion to Compel. Assuming service was completed on November 26, 2019, Citigroup's response initially would have been due on or before December 10, 2019 and Petitioner's reply would have been due on or before December 17, 2019, pursuant to Local Civil Rule 6.1(b).

2. With the consent of Petitioner, Citigroup requested and received from Judge Daniels (prior to the order of reference to Your Honor) an extension of the briefing schedule such that Citigroup's response became due on or before December 20, 2019, and Petitioner's reply, if any, became due on or before January 8, 2020.